

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
EASTERN DIVISION**

HUS HARI BULJIC INDIVIDUALLY AND AS
ADMINISTRATOR OF THE ESTATE OF SEDIKA
BULJIC, HONARIO GARCIA INDIVIDUALLY AND
AS ADMINISTRATOR OF THE ESTATE OF
REBERIANO LENO GARCIA, AND ARTURO DE
JESUS HERNANDEZ AND MIGUEL ANGEL
HERNANDEZ AS CO-ADMINISTRATORS OF THE
ESTATE OF JOSE AYALA,

PLAINTIFFS,

V.

TYSON FOODS, INC., TYSON FRESH MEATS,
INC., JOHN H. TYSON, NOEL W. WHITE, DEAN
BANKS, STEPHEN R. STOUFFER, TOM BROWER,
MARY A. OLEKSIUK, ELIZABETH CROSTON,
TOM HART, HAMDIA BEGANOVIC, JAMES
COOK, RAMIZ MUHELJIC, GUSTAVO CABAREA,
PUM PISNG, ALEX BUFF, WALTER CIFUENTES,
MUWI HLAWNCEU, CODY BRUSTKERN, MARK
SMITH, AND JOHN/JANE DOES 1-10,

DEFENDANTS.

Case No. 6:20-cv-02055-KEM

PLAINTIFFS' MOTION TO REMAND

Plaintiffs, through counsel, respectfully request, for the reasons set forth in the Brief filed contemporaneously herewith, that the Court (1) remand this action to the District Court for Black Hawk County, Iowa, and (2) enter a judgment against Defendants imposing costs and attorneys' fees associated with this action.

DATED this 26th day of August 2020.

/s/ Thomas P. Frerichs

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CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of August 2020, a true and correct copy of the above and foregoing Plaintiffs' Motion to Remand was served via CM/ECF Electronic Transmission on the following:

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